

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ASSOCIATED RECOVERY, LLC,

Plaintiff,

v.

JOHN DOES 1-44,

Defendants *in rem*.

No. 3:16-CV-1025-N-BN

In re:

744.COM	KXW.COM	UHW.COM	YJX.COM
028.COM	LNМ.COM	VCZ.COM	YLZ.COM
3DCAMERA.COM	LUOHE.COM	VGJ.COM	YQP.COM
FNY.COM	MEQ.COM	WYD.COM	YQT.COM
FX2.COM	OCU.COM	XAQ.COM	YRN.COM
FXF.COM	PIXIE.COM	XFF.COM	YTE.COM
JTZ.COM	QMH.COM	XSG.COM	YYG.COM
KGJ.COM	RUTEN.COM	YCX.COM	ZDP.COM
KMQ.COM	SDU.COM	YEY.COM	ZHD.COM
KOU.COM	SQG.COM	YGX.COM	ZULIN.COM
KXQ.COM	TAOLV.COM	YJR.COM	ZZM.COM

AGREED MOTION TO EXTEND TIME FOR PLAINTIFF'S COUNSEL TO APPEAR

Plaintiff Associated Recovery LLC respectfully moves the Court for a two-week extension for Plaintiff to retain local counsel admitted to this Court and for such counsel to appear in this action pursuant to the Court's instruction posted as ECF Document 41. The parties agree to the following points in support of this Motion:

1. This matter was transferred to this Court on April 15, 2016, from the United States District Court, for the Eastern District of Virginia;

2. The parties are scheduled to make their appearance in this matter before the Court by Friday, May 6, 2016;
3. Plaintiff's original counsel is not licensed to practice before this Court, and Plaintiff has been diligently seeking to secure local counsel for this matter;
4. Plaintiff has not yet finalized and secured local counsel for this matter but continues its efforts to do so; and
5. This agreed motion is not intended to alter or impact the timing of the proceedings before this Court.

Accordingly, Plaintiff seeks—and Defendants agree to—a two-week extension for Plaintiff to comply with the Court instruction by retaining counsel.

Dated: May 6, 2016

Respectfully submitted,

By: /s/ Rebecca J. Stempien Coyle
w/ permission by Steven M. Geiszler

Rebecca J. Stempien Coyle (VSB#
71483)
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By: /s/ Steven M. Geiszler

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ycx.com, ygx.com, yjr.com, yqp.com,
yqt.com, yrn.com, yyg.com, zdp.com,
zhd.com, zulin.com, zzm.com and Defendants
Jinwu Chen, Xumin Huang, Feng Lu, Yuhua
Jiang, Zhilong Chu, Yaoguang Zhu, Yanbin
Lin, Yu Lin, Xiaofeng Lin, Fengjing Zheng,
Xiaoying Li, Liwei Liu, Dongdong Xu, Teng
Wang, Yang Gao, Xiaohang Shen, Feng Yan*

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that on May 6, 2016, I conferred with Plaintiff's counsel, Rebecca J. Stempien Coyle, with whom I discussed the subject matter of the foregoing motion. Defendants do not oppose, and agreed to, the relief Plaintiff requests. Because Plaintiff's counsel does not have an ECF login for this Court, I also agreed to Plaintiff's counsel's request that I file the motion on her behalf.

/s/ Steven M. Geiszler

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 6, 2016 I caused the foregoing document to be served on counsel of record via the Court's CM/ECF system.

/s/ Steven M. Geiszler